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LETTER AND U S EPA REGION 1 FOLLOW UP COMMENTS TO U S NAVY RESPONSE TO
COMMENTS TO DRAFT STUDY AREA SCREENING EVALUATION SITE 4 NS NEWPORT RI

11/3/2011

U S EPA REGION 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

November 3, 2011

Maritza L. Montegross
Remedial Project Manager
NAVFAC MIDLANT, Code OPNEEV
9742 Maryland Avenue, Bldg. Z-144
Norfolk, VA 23511-3095

Re: Responses to Comments
Draft Study Area Screening Evaluation
Site 04, Coddington Cove Rubble Fill Area
Naval Station Newport

Dear Ms. Montegross:

EPA has reviewed Navy responses, dated October 14, 2011, to EPA's comments, dated June 10 and July 13, 2011, for the "Draft Study Area Screening Evaluation for Site 04, Coddington Cove Rubble Fill Area, Naval Station Newport, Newport, Rhode Island," dated April 2011. The responses were prepared by Tetra Tech for the Naval Facilities Engineering Command Mid-Atlantic. EPA follow-up comments on the Navy responses are attached. For comments/responses that EPA has not offered a follow-up comment, the Navy response is accepted. Please consider the attached follow-up comments and ensure that the Draft Final SASE adequately addresses these comments and incorporates revisions, as appropriate, to reflect Navy responses to comments.

If you have any questions, please contact me at (617) 918-1754 or at lombardo.ginny@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Ginny Lombardo".

Ginny Lombardo
Remedial Project Manager

cc: Pamela Crump, RI DEM
Darlene Ward, NAVSTA Newport
Stephen Parker, TtNUS
Thomas Campbell, TtNUS
Chau Vu, EPA
Bart Hoskins, EPA
Ken Munney, USFWS
Paul Steinberg, Mabbett & Associates, Inc.
Greg Kemp, Mabbett & Associates, Inc.
Deborah Roberts, Roberts Environmental Consulting, Inc.

**EPA Follow-Up Comments on
Navy's October 14, 2011 Responses to EPA's Comments on
Draft Study Area Screening Evaluation for Site 04,
Coddington Cove Rubble Fill Area
Naval Station Newport, Newport, Rhode Island
Dated April 2011**

Follow-Up Comments for Responses to EPA's June 10, 2011 Comments:

GC1: There is no basis for adjusting the groundwater and soil RSLs to 10 times higher to be used as screening levels for surface water and sediment. It has always been EPA's practice to use groundwater and soil RSLs for screening surface water and sediment. The National Recommended Water Quality Criteria can also be used in addition to groundwater RSLs to screen surface water: <http://water.epa.gov/scitech/swguidance/standards/current/index.cfm>.

GC5: The threshold of 5% is not only a suggested value in human health risk assessment guidance, it is also a standard threshold used by EPA in the review of Ecological Risk Assessments. However, the issue here is that fewer than 20 samples were taken, and EPA's position in that case is that the threshold of 5% detection cannot be used. The screening should therefore not eliminate COPCs based on frequency of detection.

SC5: The risk-based SSLs provided on the RSL tables are developed based on DAF of 1. This is a conservative assumption that there is no dilution; however, these values are used for screening, not for cleanup. According to EPA SSL Guidance, DAF of 20 can be used for large areas of 0.5 acre or more. If the site is at least 0.5 acre, screening levels based on DAF of 20 can be used. If the site is smaller than 0.5 acre, DAF of 1 must be used.

SC8: As stated in the original comment, there are quite a few chemicals exceeding screening benchmarks, and there could be additive toxicity associated with multiple contaminants. Further evaluation of sediment is warranted due to the exceedance of screening benchmarks for pesticides, PCBs and numerous metals. PECs are not screening-level benchmarks. Comparisons to PECs should be part of a refinement in a BERA, and is not acceptable as part of a screening evaluation.

SC9: See EPA's follow-up comment on SC 8.

SC13: Beginning in 2009, EPA has strongly encouraged the collection of valent-specific data when chromium is likely to be a COC at a site to provide accurate information in evaluating chromium. In the case where information on chromium speciation is not available, EPA assumes that chromium found at the site is hexavalent chromium (chromium VI) to be conservative since chromium VI is likely to be more toxic to humans than chromium III. In addition, EPA has also concluded that chromium VI may act through a mutagenic mode of action following administration via drinking water and Age-Dependent Adjustment Factors (ADAFs) must be applied when assessing cancer risks from early-life exposure for those receptors less than 16 years of age. EPA's current approach to evaluate chromium at Superfund sites is either to collect valent-specific data or assume that data collected are for chromium VI without doing chromium speciation.

Follow-Up Comments for Response to EPA's July 13, 2011 Comments:

SC6: See comment above on chromium. There is no site-specific information on chromium VI, but there is also no site-specific information that chromium III is the only chromium species present at the site. In that case, it has been EPA's practice to assume chromium VI to be conservative and consistent with our approach at other Superfund sites.

SC8: See comment above regarding chromium.